



La Grande Ranger District

**Wallowa-Whitman National Forest
3502 Highway 30, La Grande, OR. 97850
(541) 963-7186**

January 15, 2015

Dear Forest User:

The La Grande Ranger District has recently completed a preliminary analysis for the **East Face Vegetation Management Project**. The area being evaluated consists of approximately 47,621 acres, approximately 46,397 acres are on National forest system lands on the La Grande and Whitman Ranger Districts and 1,224 acres are on Vale Bureau of Land Management (BLM) lands. The project area is approximately 12 miles west of the town of North Powder, Oregon and is located south of the City of La Grande Municipal watershed, north of the North Fork John Day Wilderness, and west of the Oregon Department of Fish and Wildlife (ODFW) Elkhorn Wildlife Area. The planning area straddles two counties (Baker and Union), encompasses portions of 3 different wildland urban interface areas (WUI's) and includes over 20 miles of shared boundary with private, state and Bureau of Land Management forest and range lands. Within these WUI areas there are numerous buildings and residences along with industrial and non-industrial private forest and range lands. In addition, the planning area encompasses the highly used Anthony Lakes recreation area which includes ski resort facilities, numerous campgrounds, recreational trails and recreation residences. The project area is located at Townships 5, 6 and 7 South, Ranges 36, 37, and 38 East.

As a project or activity implementing the land management plan not authorized under the HFRA, this project is subject to subparts A and B of the project level pre-decisional administrative review process as described in 36 CFR 218.

Background

Due to an existing strong collaborative relationship between the Forest Service (FS), Oregon Department of Forestry, and Natural Resources Conservation Services, it became apparent that the East Face project provided a tremendous opportunity to apply compatible vegetation and fuels management treatments on federal, adjacent private lands and Oregon Department of Fish and Wildlife lands. The East Face Vegetation Management project area in combination with adjacent BLM, State, and private lands became a pilot project for the National Cohesive Wildfire Strategy (CWS) offering opportunities to apply the "all hands, all lands" principles and implement efforts to move the area towards the goals of the CWS. This analysis deals solely with activities on FS and BLM lands; however, treatments proposed in this project area have been coordinated with the fuel reduction and vegetation management activities occurring or planned to occur on adjacent private and state lands.

Cohesive Wildfire Strategy

In response to requirements of the Federal Land Assistance, Management, and Enhancement (FLAME) Act of 2009, the Wildland Fire Leadership Council (WFLC) directed the development of the National Cohesive Wildland Fire Management Strategy.

The CWS is a collaborative process with active involvement of all levels of government and non-governmental organizations, as well as the public, to seek national, all-lands solutions to wildland fire management issues.

Three primary factors have been identified as presenting the greatest challenges and the greatest opportunities for making a positive difference in addressing complex wildfire issues. They are:

Restoring and maintaining resilient landscapes. The strategy must recognize the current lack of ecosystem health and variability of this issue from geographic area to geographic area. Because landscape conditions and needs vary depending on local climate and fuel conditions, among other elements, the strategy will address landscapes on a regional and sub-regional scale.

Creating fire-adapted communities. The strategy will offer options and opportunities to engage communities and work with them to become more resistant to wildfire threats.

Responding to Wildfires. This element considers the full spectrum of fire management activities and recognizes the differences in missions among local, state, tribal and Federal agencies. The strategy offers collaboratively developed methodologies to move forward.

Purpose of and Need for Action

The purpose and need is represented by the difference or “gap” between the existing condition and its desired condition based on Forest Plan management direction. Therefore, there is a need:

- to restore and promote forest structural and compositional conditions reflective of historic ranges of variation (HRV) across the planning area.
- to enhance landscape resilience to future wildfire, insect and disease risk, and capitalize on the opportunity to apply cohesive wildfire strategy principles across all landownerships.
- to maintain and enhance the representation of threatened whitebark pine stands in the planning area.
- to enhance the diversity and quality of habitat conditions across the planning area to help reduce ungulate impacts on agricultural lands and improve overall diversity and distribution of wildlife habitat.
- to maintain and enhance connectivity of ecosystems by providing corridors that will promote resilient and sustainable landscapes.
- to maintain and enhance local communities and economies by providing a diversity of resource management activities, recreational opportunities, commodity outputs, and ecosystem services from public lands.
- to build and strengthen relationships amongst the Wallowa Whitman Forest stakeholders through a collaborative process that fosters mutual learning, ensures collective input and access to knowledge of the collaborative members, and helps develop understanding amongst stakeholders.

Proposed Action

Treatments in the Proposed Action respond to the purpose and need for the East Face Project. They are designed to meet the goals of the Cohesive Wildfire Strategy (CWS) to restore and maintain landscapes, create fire adapted communities, and improve fire response times by:

- Modifying fire behavior and intensity – also protects recreation facilities and watershed values.

- Creating and maintaining defensible fuel profile zones in strategic areas on Federal lands to compliment fuel reduction activities on private lands, aid future fire suppression efforts, and minimize natural resource impacts in the event of a wildfire.
- Increasing public and firefighter safety while protecting natural resource values in the event of a wildfire.
- Providing for landscape and local connectivity corridors.
- Improving the sustainability of forested stands against insects and disease.
- Accelerating stand structure toward HRVs.
- Enhancing management indicator species forage and security habitat.
- Providing for commercial products, firewood, and employment opportunities for local economies.
- Manage the road system for the area to protect resources and provide for recreation and administrative access (including emergency access) in the project area.

PRIORITY TREATMENT AREAS

The East Face project has been divided into the following 3 areas based on their proximity to private property, values at risk from wildfire, and/or logical locations for suppression operations.

Priority One *(All WUI areas and areas within 1.5 miles of private land)*

Dense mixed conifer stands with heavy accumulations of dead and down material have created hazardous fuels conditions along the forest boundary and within the WUI's. There is a need to strategically place treatments in areas that would slow the progress of wildfire towards the interface, while providing a defensible fuels profile zone (DFPZ) for firefighting resources. Treatments would be focused on:

- Creating a DFPZ along the boundary between public and private owned land.
- Creating a DFPZ adjacent to Twin Mountain Roadless Area along 73 road.
- Creating defensible space around the structures and improvements within the Anthony Lakes WUI.

Priority Two *(Strategic placed fuels breaks outside of the WUI or not with 1.5 miles private property)*

Dense conifer stands and heavy accumulations of surface fuels beneath the canopy have created hazardous fuels conditions throughout the project area. The proposed treatments would be anchored into the existing road system and reinforced by natural barriers. These treatments would not be designed to stop a wildfire but provide suppression forces a higher probability of successfully managing a wildfire with indirect suppression tactics.

Priority Three *(Treatments not within WUI or within 1.5 miles of private, or not part of a strategic fuels break).*

There is need to restore and promote forest structural and compositional conditions reflective of historic ranges of variation across the planning area. Treatments would be designed to manage vegetation for multiple purposes, including hazard fuels reduction, ecosystem restoration or maintenance, silviculture and wildlife.

Within these areas, a series of strategically located defensible fuel profile zones (DFPZ) would be created. A combination of mechanical harvest and fuel reduction treatments designed to reduce crown fuels followed by surface fuel reduction treatments would occur within these DFPZs. Treatments in Priority Area 1 would complement treatments on Private and State lands where possible with a goal of creating a contiguous DFPZ along and across these boundaries using stand treatments and natural features. In the other areas, treatments would be on either side of roads where possible and incorporate existing natural fuel breaks and topography. Zone width would vary following stand types and needs recognizing areas where a more logical topographical or vegetative break or other resource/management need dictate a narrower or wider strip.

Strategies for creating fuel reduction areas include the treatments described below in the East Face Vegetation Management project area. Refer to the attached map.

Commercial Fuels Reduction & Vegetation Management Treatments

The following fuels reduction and vegetation management treatments would occur within the project area to address the purposed and need (see also attached maps):

Commercial Thinning harvest (HTH) prescription is removal of trees above desired stocking levels at regular intervals designed to stimulate the growth of the desired residual trees. **Affected Units:** 1, 3, 12, 19, 22, 33-34, 48, 55-62, 64-65, 68-69, 72, 74-78, 80, 91-92, 94-98, 102-106, 111-112, 115-116, 119-120, 122, 129, 131, 140, 143-145.

Sanitation harvest (HSA) prescription is designed to remove dead, damaged, or susceptible trees to prevent the spread of pests or pathogens. **Affected Units:** 2, 20, 128, 133.

Shelterwood harvest (HSH) prescriptions result in a stand of trees being established through a series of cuttings designed to facilitate establishment of a new cohort of trees. Due to site conditions, scattered overstory trees are retained to provide some shade or site protection for the regenerating stand beneath it and to meet green tree recruitment needs. Once established, the overstory trees can be removed to promote maximum growth and development of the regenerated understory, or retained for structural or habitat needs. **Affected Units:** 13-14, 21, 39-40, 44, 51, 89, 93, 108, 114.

Partial Removal harvest (HPR) prescription is the partial removal of the overstory over an established understory. Trees retained in the overstory are at levels adequate to meet green tree recruitment needs. **Affected Units:** 4-5, 17.

Improvement harvest (HIM) thinning and removal of undesirable trees (poor form, damaged condition, ecologically inappropriate species etc.) within a stand for the purpose of improving the growth, composition and quality of the remaining stand. **Affected Units:** 6-11, 15-16, 18, 23-27, 29-30, 32, 35-38, 41-43, 45, 47, 49-50, 52-53, 63, 67, 70-71, 73, 79, 81, 86-88, 99-101, 109-110, 113, 117-118, 121, 123-126, 130, 132, 134, 141-142, 146.

Fuels Harvest (HFU) prescription in which trees creating ladder fuels and with excess down dead woody material are removed offsite using commercial harvest methods. **Affected Units:** 28, 31, 46, 66, 127, 135, 138-139, 147.

Patch Openings (HPO) are designed to reduce crown fuels and increase the presence of fire resistant and lighter crowned tree species, such as western larch or white pine and begin to produce some structural variation in homogenous stands. Prescription would create small canopy openings (4 to 6 acres) focusing on promoting pine and larch to improve stands resilience to wildfire and insect and disease outbreaks. Surface fuel loading would be reduced to the forest plan minimums through removal, mastication, grapple piling, or hand piling. Planting would be used in patch openings to supplement natural regeneration and meet stocking requirements. **Affected Units:** 82-85 and portions of 43, 55-57, 59-61, 65, 146.

Table 1. Commercial Treatment Acre Totals by Silvicultural Prescription

Prescription	Acres
Commercial thinning - HTH	3,563
Sanitation harvest – HSA	210
Shelterwood Harvest - HSH	318
Partial Removal - HPR	43
Improvement harvest - HIM	2,200
Fuels Harvest - HFU	245
Patch Openings – HPO	143*
Total Commercial Treatment	6,722

*Includes HPO treatments in HIM/HPO and HTH/HPO units

Non-Commercial Fuels Reduction & Vegetation Management Treatments

Fuels Reduction Hand Work Only (WFH)

Approximately 5,184 acres of treatments designed to remove ladder fuels and manage understory tree density at appropriate levels using manual methods. Ladder fuels are defined as trees (less than 9" DBH) growing under the drip line of the dominant and co-dominant trees within the project area. These trees provide a ladder for flames into the crowns of the larger trees increasing the probability for high crown fire. Dead and down fuels would also be also be piled and burned.

Affected units are: 301-303, 306-307, 310-312, 316, 325, 328, 335-336, 338, 340, 353, 355, 357-359, 361, 366, 369-372, 374, 377-379, 383, 390-393, 395, 397-398, 400-401, 404-409, 414-415.

Fuels Reduction Mechanical (WFM)

Approximately 1,745 acres of pre-commercial sized tree density management followed by a surface fuels reduction using a combination of hand work, mastication (slash busting) or grapple piling where surface fuel loadings exceed 15 tons/acre. Mechanical activities would not be allowed within PACFISH buffers in these units. **Affected units are: 313, 315, 342-343, 356, 362, 364, 367, 373, 380, 384, 386, 394, 396, 412, 417, 421, 424-425, 429, 431, 436.**

Pre-commercial Thin (PCT)

Manual pre-commercial thinning of past harvest units would occur on 3,447 acres resulting in variable spacing (14-20 feet between trees) including retention of approximately 10% of untreated area to provide for wildlife habitat needs. Species preference will be western larch, ponderosa pine and Douglas-fir. Riparian areas may be treated as described below. **Affected units are: 304-305, 308-309, 314, 317-321, 323-324, 326-327, 329-334, 337, 339, 341, 345-352, 354, 360, 363, 365, 368, 375-376, 381-382, 385, 387-389, 399, 402-403, 410-411, 413, 416, 418-420, 422-423.**

Fuels Blocks - Prescribed Burning

Approximately 6,271 acres of prescribed burning is proposed within the area implemented over the next 10 years. Low to moderate intensity prescribed burning would reduce litter, duff, and 0-3 inch surface fuels. Burning would also reduce understory stocking levels and promote development of seral species while enhancing forage and browse for domestic and wildlife species. **Affected units are: 600 - 612**

Prescribed Burning	
Burn Block	Total Acres
601	967
602	183
603	1,317
604	514
605	440
606	158
607	658
608	182
609	223
610	513
611	775
612	341
Total	6,271

Mechanical fire lines

Mechanical fire lines(less that 2ft wide) would be constructed between road segments to provide containment lines prior to unit ignition. Burning along private land boundaries would be coordinated with adjacent landowners.

Riparian habitat conservation area (RHCA) vegetation is also in need of management to reduce overstocking and fuel loadings. Handwork only would occur in RHCAs. Precommercial thinning units (PCT) and hand treatment only fuel reduction units (WFH) would have no activity buffers of 10 feet along class IV streams (intermittent non-fishbearing), 30 feet on class III streams (perennial non-fishbearing), and 50 feet along class I streams (fishbearing). No mechanical treatment or commercial removal would occur within RHCAs. Depending on the amount of slash generated, hand piling and hand burning of slash piles would occur outside of no activity stream buffers. **Affected units: 301-302, 304-314, 316, 318-320, 326-328, 332-333, 335-336, 353, 355, 357, 359, 366, 368-369, 376-377, 382-383, 387, 392-393, 395, 397, 399, 401, 404, 406-410, 414, 418, 420, 422.**

Direct ignition for prescribed fire would occur within RHCAs. Minimum stream buffers for direct ignition are; Class I > 100 feet, Class III > 75 feet, and Class IV > 50 feet. **Direct Ignition Burn Blocks: 601, 603-607, 610-612.**

Scenic Resources – In order to meet the intent of high to moderate scenic integrity along areas viewed from the Elkhorn Scenic Byway, the Anthony Lakes Recreation Area, Forest Road 7312, Wolf Creek Road 4315, and Forest Road 4300 a variety of criteria such as retention of large trees, screening, low stumps, and marking trees on the side away from these roads, etc. will be coordinated with the project Recreation Specialist and applied to treatment units during layout, marking, and implementation.

Affected units: 1, 8, 10-12, 15-17, 19, 21-22, 46, 48, 50-51, 55-56, 59-63, 74, 91, 102, 112, 115-116, 119-124, 128, 130-134, 147, 301, 306-307, 311-320, 328-329, 335-336, 341, 353-355, 377-378, 401, 404-410, 413, 431.

Snags in Harvest and Fuel Reduction Units – With the exception of an occasional snag removed for safety or construction clearing, no snags ≥ 12 inches dbh would be removed within these units.

Protect existing standing large snags (>12 inches, DBH) during firing operations through avoidance or fuels distribution requirements (FDR) as practical. If large trees are killed through project implementation they will be left for wildlife snags, unless they pose a safety hazard to roads, the public, or project personnel.

Connective Corridor Units – The goal within these units would be to maintain and enhance their canopy closure and structural complexity. Snags, large down wood, and multiple canopy layers (if appropriate for the site) would be maintained in these stands. Basal area would be maintained within the upper half of the management zone, which would approximate canopy closures in the upper 1/3 of site potential. Stocking levels would be managed near the upper management zones for basal area except where tree quality and crown conditions are such that this level of stocking is unattainable, in these areas, 20% of the stand would be retained in untreated clumps. Trees with as little as 20% live crown would be retained if needed to maintain basal area levels. All snags greater than or equal to 12 inches dbh would be retained. Down logs would be retained at the following levels:

200 lineal feet per acre

Minimum lengths of logs 20 feet or largest available

Minimum of 12" small end diameter logs or largest available

Affected units: 011, 015, 020, 016, 039, 058, 100, 122, 128, 133, 132, 308, 311, 403, 431

Roadside Hazard Trees - Danger trees (standing trees that present a hazard to people due to conditions such as, but not limited to, deterioration or physical damage to the root system, trunk, stem, or limbs and the direction of the lean of the tree would allow that tree to reach the roadway if it fell) would be cut along all haul roads (approximately 15 trees/mi). If the trees are within no-activity RHCA buffers as described previously or needed to meet down wood requirements they would be cut and left

on site. If they are outside of those areas or not required to be retained for other resource needs and are of commercial value, they may be removed with this timber sale.

Whitebark Pine Restoration – Treatment within the following units will entail clearing of all trees within 25 feet of whitebark pine trees to reduce competition and improve tree vigor and protect them in the event of wildfire in the area by changing fire behavior in their immediate area. The remainder of the unit will be treated following the primary prescription described above for that unit (PCT, WFH, or WFM).

Affected units: 305, 307, 309-313, 315-317, 431.

Removal Systems Summary:

Proposed harvest treatments are estimated to result in removal of approximately 21.9 million board feet of saw and non-saw material using the following yarding systems.

- Skyline based yarding systems 1,041 acres
- Ground based yarding systems 5,348 acres
- Helicopter yarding systems 333 acres

Due to weight limitations which will not support log haul, a new bridge would be installed on the 7312 road over the North Fork of Anthony Creek which is a primary haul route for the East Face project area.

No new permanent road construction is proposed with this project. In addition to regular road maintenance activities on roads which will be used to facilitate harvest activities, approximately 78.08 miles of road reconstruction would be proposed in the following categories:

- 26.8 miles - Specified road reconstruction/maintenance – to re-open roads which have grown closed.
- 51.28 miles – Resource Protection Reconstruction – road work to fix/prevent sediment issues and facilitate timber haul.

Approximately 11.84 miles of temporary road construction are proposed to facilitate harvest systems. Approximately half of those miles are on existing wheel tracks on the ground and would require very little in the way of ground disturbance to be used for harvest activities. Temporary roads would be treated after use by implementing some or all of the following activities: installation of erosion control devices, ripping to reduce soil compaction, seeding, and camouflaging roads to discourage further use. 105.41 miles of currently closed roads will be re-opened to facilitate harvest and fuel reduction activities. In general, currently closed roads opened to facilitate project activities would be reclosed at the conclusion of fuel reduction/harvest activities (refer to the post sale road management plan section below and attached map). If winter logging is done using the 4300, 4300020, 4315, 4316, 4330, 7312, 4380 roads, use would be coordinated with the District Recreation Manager to designate an alternative snowmobile route while log haul is occurring.

The culvert on Wolf Creek on the 4316800 road has been identified as a fish passage barrier. This culvert would be either removed or replaced to allow for fish passage to high quality habitat above the culvert.

Right-of-Way (ROW) access would be acquired for 0.37 miles of road 7302 across privately private lands adjacent to the project area in order to facilitate logging and fuel reduction activities. Access is not going to be needed in the long term on 2.17 miles of the private road north of Pilcher Creek Reservoir which accesses forest road 4315952 and a temporary road use permit will be acquired. If the road is needed for public access and future management, easement acquisition will be pursued (refer to attached map).

Forest Plan Amendment

As a part of the East Face project, the Wallowa-Whitman National Forest Land and Resource Management Plan (Forest Plan) would be amended to include changes to the following sections outlined below.

Section 1: Treatment in Old-growth Below HRV – Forest Plan Amendment

Stand density treatments throughout the project area have been designed to improve tree health and enhance long-term old growth characteristics. Forest Plan standards restrict harvest treatment in LOS that is below HRV. An HRV analysis of LOS, by biophysical grouping has been completed for this project area and as described above indicates deficiencies in both OFSS and OFMS structure within some potential vegetation groups, with OFSS being nearly non-existent. OFMS structure is more prevalent in the project area. Some stands which were historically OFSS have developed into OFMS due to fire exclusion.

In order to restore these stands to their historic structure, enhance the health of the stands, and reduce ladder fuels in LOS stands in strategic locations within the project area, the following modification is made to the Wallowa-Whitman National Forest Land and Resource Management Plan, Regional Forester Amendment #2, for the East Face Vegetation Management Project Planning Area.

Current Direction: d. Scenario A If either one or both of the late and old structural (LOS) stages falls below HRV in a particular biophysical environment within a watershed, then there should be no net loss of LOS from that biophysical environment. Do not allow timber sale harvest activities to occur within LOS stages that are BELOW HRV.

Amended Direction: d. Scenario A If either one or both of the late and old structural (LOS) stages falls below HRV in a particular biophysical environment within a watershed, then there should be no net loss of LOS from that biophysical environment. However, timber sale harvest activities may occur within LOS stages that are below HRV, if doing so would better meet LOS objectives by moving the landscape towards HRV, and provide LOS for the habitat needs of associated wildlife species (Regional Forester's 2430 Letter, "Guidance for Implementing Eastside Screens", dated June 11, 2003).

Treatments include commercial thinning (HTH) of trees less than 21 inches in diameter, reducing levels of standing and down material, thinning and cleaning of small diameter trees, pile and burn, and prescribed burning. Treatments under this amendment would not result in a net loss of old growth, but the amendment would provide for treatments that would maintain old growth habitat as defined by Forest standards and definitions. Old growth habitat is measured by levels of down wood, snags, number of canopy layers and large trees (See Regional Forester's amendment #2 –screens- and Wallowa-Whitman National Forest Recommended Definitions for New Structure Stages per Amendment #2, November 9, 1995).

Approximately 97 acres would receive commercial thinning prescriptions. Trees ≥ 21 inches dbh would not be cut. Treatments would move multi-strata stands towards single-strata stands (97 acres) while maintaining adequate levels of down logs and snags within strategic fuel reduction areas. **Affected Units: 19, 119, 129, 131.**

Section 2: Treatment in Allocated Old Growth (MA15) - Forest Plan Amendment

Treatment in a portion of the allocated old growth located in T7S, R37E, Section 11 is proposed to provide a continuous fuels reduction treatment along the 73 Road. This allocated old growth area is strategically located on the ridgetop along the 73 road on the southern boundary of the project area and adjacent to a WUI.

The Forest Plan does not address treatment needs that reduce fuels and modify fire behavior in old growth within or in close proximity to WUIs. The Forest Plan does say under Timber at 4-90, "areas allocated to old-growth timber will have no scheduled timber harvest although salvage

may occur following catastrophic destruction if a more suitable replacement stand exists.” The exception to salvage following catastrophic destruction has little utility since this old growth area is healthy, functioning old growth. The direction prohibiting scheduled timber harvest also has little utility since treatment objectives are fuels reduction and modifying fire behavior. These objectives give little consideration to timber harvest or commercial viability.

Due to the lack of direction from the Forest Plan to provide fuels reduction criteria for entering old growth within or adjacent to a WUI, the ID team with Forest support, recommends that a site specific non-significant Forest Plan amendment be included as a component of the proposed action in order to reduce fuels and modify fire behavior in a portion of the allocated old growth located in T7S, R37E, Section 11.

The following guideline is being added to clarify compatibility and use of fuels reduction treatments in 75 acres of the Management Area 15 area located in T7S, R37E, Section 11:

Wildland Urban-Interface Guideline. Mechanical and non-mechanical fuels reduction is permitted within 75 acres of the allocated old growth stand located in T7S, R37E, Section 11 located adjacent to the Rock Creek/Bulger WUI to meet fuels treatment objectives. Where treatments are applied they shall retain old-growth characteristics and move the treated portion of the stand to OFSS stand structure.

The amendment would allow fuels reduction prescription treatments as described under number one above within this 75 acre portion of allocated old growth. Treatments include commercial thinning of trees under 21 inches, removing dead standing and down material, whipfelling and cleaning of small diameter trees, handpiling and jackpot burning. Treatments under this amendment would not result in a net loss of old growth, but the amendment would provide for treatments that would maintain old growth habitat as defined by Forest standards and definitions. Old growth habitat is measured by levels of down wood, snags, number of canopy layers and large trees (See Regional Forester’s amendment #2 –screens- and Wallowa-Whitman National Forest Recommended Definitions for New Structure Stages per Amendment #2, November 9, 1995).

The treated portion of this area would remain designated as allocated old growth. This amendment would not change allocation as designated under the Forest Plan. No trees >21 inches would be cut. **Affected Unit: 134**

Section 3: Treatment in MA6 – Commercial and Non-Commercial Harvest in WUI

Treatment in the backcountry recreation area located in the project area is proposed to provide fuels reduction within the Anthony Lakes WUI near the Floodwater Flats Recreation Tract, and the Anthony Lakes campground and ski area.

The Forest Plan does not address treatment needs that reduce fuels and modify fire behavior in areas allocated to MA6 within or in close proximity to WUIs. The Forest Plan does say under Timber at 4-69, “timber harvest may occur in the event of a catastrophe such as a fire or insect outbreak when doing so would maintain or improve recreation or visual characteristics and meet the landscape management direction for MA6....harvest may also occur when analysis shows timber removal to be necessary to prevent spread of insects onto adjacent lands.” The direction prohibiting scheduled timber harvest also has little utility since treatment objectives are fuels reduction and modifying fire behavior. These objectives give little consideration to timber harvest or commercial viability.

Due to the lack of direction from the Forest Plan to provide fuels reduction criteria for entering MA6 within or adjacent to a WUI, the ID team with Forest support, recommends that a site specific non-significant Forest Plan amendment be included as a component of the proposed action in order to reduce fuels and modify fire behavior in strategic areas to protect recreation

facilities and the Floodwater Flat Recreation Tract located in T7S, R36E, Section 7 along road 7300160. These treatments will also introduce heterogeneity into a very homogenous overstocked landscape at growing risk to attack from insect and disease.

The following guideline is being added to clarify compatibility and use of fuels reduction treatments in the Management Area 6 area:

Wildland Urban-Interface Guideline. Mechanical and non-mechanical fuels reduction is permitted within 803 acres of MA6 located within and adjacent to the Anthony Lakes WUI to meet fuels treatment objectives. Treatments to maintain the integrity of the DFPZ would occur every 15-20 years. Where treatments are applied they shall maintain and improve recreation and visual characteristics.

This area would remain designated as MA6. This amendment would not change allocation as designated under the Forest Plan. **Affected Units: 138, 139, 307, 309-312.**

Post Sale Road Management Plan (refer to attached map):

A road management plan (refer to attached map) has been developed for the East Face project area. In general, the current open road system will remain the same following implementation of the East Face Vegetation Management project with the exception of the roads below which will have the following changes:

- Roads 7312100, 7312400 – would be remain open following project implementation because current road densities are well below Forest Plan standards in this area and these roads were identified as not creating any resource damage and currently being used by the public.
- 7312150 road – is a dead end drawbottom road which would be closed to protect water quality.
- Roads 7320, 7300140, 7315, 4320150, and 4315800 are important access roads within WUI areas which are currently closed that would be closed again following use in this project; however, closure would be with a gate to allow for ease of access during fire suppression activities.
- With the exception of the roads described above, any road currently closed by gate or barricade to be re-opened and used to facilitate harvest/fuel reduction activities would be re-closed at the conclusion of harvest activities within the units they access.
- 38.5 miles of roads identified as either duplicate access or no longer needed on the landscape for resource management and recreation access and would be decommissioned, returned to resource production, and removed from the road system. Many of these have grown in and have not received any use in the last 20 years.

Summary – The following table displays the acres of commercial and non-commercial fuels reduction treatments proposed in each of Priority Treatment Areas:

Priority Treatment Areas	Commercial Treatment Acres	Non-commercial Treatments Acres	Total Acres
Area One	2,844	5,775	8,619
Area Two	3,325	4,531	7,856
Area Three	553	70	623
Total	6,722	10,376	17,098

The project is scheduled to begin implementation in 2016.

Resource and Management Concerns

Forest Plan direction, Endangered Species Act (ESA), public input and National Policy have led the Forest Service Planning Team to consider the following preliminary issues associated with activities in the East Face Vegetation Management project area:

1. **Fire Behavior** – Surface and ladder fuels have increased, and continue to increase as a result of suppression activities. Management designed to reduce hazardous fuels would modify fire behavior thus reducing risk to property and resources including downstream water quality and quantity while increasing fire suppression opportunities.
2. **Forest Health/Sustainability** – The area has high levels of overstocked stands which will become prone to mortality from insects and disease if left unmanaged.
3. **Economics** – The area is characterized by small materials and difficult/expensive logging systems which will make it difficult for the value of the product removed to support the logging systems needed for removal resulting in a potential deficit sale.
4. **Landscape Connectivity/Patterns** – Management indicator species use specific areas for movement between habitats and to support their needs. These areas need to be considered in treatment design to protect their functionality.
5. **LOS Deficit** – Old forest levels are well below their conditions in the project area; therefore, existing stands need to be maintained or enhanced and other stand accelerated toward old forest.
6. **Big Game Habitat** – Project activities which create big game disturbance during critical periods needs to be managed in order to keep elk and deer on public lands. Also need to enhance available forage in this heavily forested landscape.

Comments

The East Face Vegetation Management project is currently a proposal and not a decision. Your comments will be considered and used to identify issues associated with the proposal and develop alternatives that are responsive to the identified issues. Although comments are welcome at any time, they are most helpful if received early. I encourage you to return your comments by February 13, 2015. Comments that provided on this project will become a matter of public record.

Written comment should be addressed to Bill Gamble, District Ranger, La Grande Ranger District, 3502 Highway 30, La Grande, OR, 97850 or by email at bgamble@fs.fed.us. If you have any questions additional information can be provided by contacting me at (541) 962-8582.

Sincerely,

/s/ *Bill Gamble*

Bill Gamble
District Ranger
La Grande Ranger District

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, and marital or family status. Any person who believes he or she has been discriminated against in any USDA related activity should immediately contact the Secretary of Agriculture, Washington, DC 20250. USDA is an equal opportunity provider and employer.